



Vermont Homeland Security Unit

Homeland Security Grant Program

Programmatic Monitoring Guidelines

Introduction & Purpose

The State of Vermont, Department of Public Safety (DPS), Homeland Security Unit (VTHSU), as the federal grantee, is responsible for monitoring grant sub-recipients and ascertaining that all compliance and programmatic responsibilities are fulfilled.

State and local sub-grants are monitored in order to (1) track the progress and alignment of agencies towards the State Preparedness Report (SPR) and Core Capabilities, (2) track the support VTHSU is providing to local and State agencies for implementation of the SPR and Core Capabilities, and (3) determine whether funds designated for planning, equipment, training and exercises are being obligated and expended in accordance with DPS/VTHSU and FEMA Grants and Programs Directorate guidelines.

Monitoring provides a comprehensive picture of how Core Capabilities are progressing statewide. Monitoring assists VTHSU in identifying areas of need for subrecipient support, provides feedback on ways to improve its services to subrecipients, and illuminates the strengths and areas for improvement in subgrantees programs. Both forms of monitoring require written documentation.

Programmatic monitoring, executed either through an office based (“desk”) assessment or an on-site visit, focus on two areas:

- 1) Statutory and regulatory compliance with procurement, planning, inventory control, training and exercise actions, and
- 2) Goal and Objectives achievement focused on subrecipient stated operational targets, including equipment deployment.

The programmatic monitoring program places a high value on consistent, fair, transparent, and reasonable reporting and accountability by subrecipients.

Grant programs subject to VTHSU programmatic monitoring efforts include, but are not limited to State Homeland Security Program (SHSP), Operation Stone Garden Program (OSGP), and Port Security Grant Program (PSGP) federal awards that are currently open.

The metrics, requirements, and guidelines used to conduct programmatic monitoring are found in, though not limited to, the following core documents:

- 2CFR (Grants and Agreements)
- OMB Circular A-102 (Administrative Requirements)
- OMB Circular A-133 (Audit Requirements)
- The relevant FY Funding Opportunity Announcement/Program Guidance
- Certifications and Assurances

- Subrecipient Grant Award Agreement
- VT NIMS Implementation Plan

On-Site Monitoring

The VTHSU On-Site Monitoring process is aligned with and designed to ensure compliance with 2CFR, among other guidance documents. The VTHSU Programmatic Monitoring Team uses an interview template designed to comprehensively address the spectrum of content.

The Monitoring Form is the driving engine of a monitoring visit, and subrecipients ought to be familiar with all aspects of the document in order to properly prepare. Specifically, the visit matrix is categorized into 7 sections:

- A- Overall/General Assessment
- B- Recordkeeping
- C- Equipment, with accountability and inventory control as per 2CFR, being focus areas
- D- Training
- E- Training
- F- Planning
- G- National Incident Management System Progress

At least 6 subrecipients will be selected for an on-site monitoring visit each year. The determination for which entities are monitored is based upon several possible criteria:

- New subgrantee (to be monitored within the first performance year)
- Periodic routine review of subrecipient projects
- Review of specific items of interest
- Response to perceived problems or issues (i.e. not meeting goals or on the high risk list)
- Response to financial audit or programmatic monitoring exceptions
- Response to requests for assistance from subrecipients

Visits will be communicated to subrecipients via multi-media dissemination of a long term monitoring visit calendar, which will be developed annually upon receipt of federal grant funds.

A pre-monitoring analysis of the subrecipient will be conducted. This is done by monitoring personnel to determine which items should be reviewed during the site visit. The signed grant agreement(s), including Attachment B of the grant agreement, vendor invoices and correspondence, Financial Report Forms, Subgrant Progress Reports, audit findings, amendment requests, rate of expenditures, NIMS implementation data, reimbursement requests, and any additional compliance requirements should all be reviewed during the pre-monitoring analysis. The VTHSU personnel should also request a copy of the subgrantees mandated asset inventory, based on grant awards and reimbursement requests. At this time, the VTHSU personnel should note any file irregularities or problems that are discovered.

A pre-visit phone call, to schedule a date and time for the monitoring visit, should be made two to three weeks in advance.. The initial contact should outline for the subrecipient the items that will be reviewed during the site visit and any preparation the subrecipient should make prior to the visit. The phone call should be followed up by a pre-visit confirmation letter (Attachment A), preferably the same day, detailing the agreed to date and

time, and items to be reviewed. It should include an agenda for the visit, a copy of the Monitoring Report Form (interview matrix) (Attachment B), and a sample Property Records List.

The visit involves discussions about project implementation such as milestones, timeline, rate of fund expenditure, project operations, performance measures, and evaluation. The visit includes interviews with key agency members, a review of documentation and equipment, and an exit interview to discuss findings and address questions or concerns. The exit interview will clarify future corrective action items for the subrecipient and highlight what will be included in the post-visit letter to the subrecipient. If any outstanding issues are identified, the subrecipient is required to submit a Corrective Action Plan within the allotted time identified in the post-visit letter, typically 45 days, identifying what steps the subrecipient is taking to resolve the issues.

The process for the site visit is as follows:

- VTHSU Authorized Personnel arrives on time, presents identification
- Introductions with key agency members
- Conducts interview(s)
 - Establishes proper contact person, working space, subrecipient working hours, parking, security
 - Authorized personnel details the monitoring process
- Reviews the Monitoring Report Form with sub-recipient
- Authorized Personnel takes notes throughout the visit on the Monitoring Report Form
- Authorized Personnel reviews equipment, takes pictures of valuable, serialized equipment and records on photo log (Attachment C).
- Conducts exit interview used to:
 - Address Findings
 - Detail follow-up requirements with deadline for compliance – Corrective Actions
 - Q&A Session with Subrecipient (Outreach). Items to cover include:
 - Proper filing of Financial Report Forms
 - Progress reporting
 - NIMS
 - VCOMM
 - New policies and procedures
 - Vehicle policy
 - Other funding sources
 - Training
 - Exercise
 - FAQ's
 - MOU templates
 - Amendment requests
 - Grant application

Upon completion of the visit, the VTHSU personnel should review the file and follow up with a post-visit results/corrective action letter (Attachment D). Findings and Corrective Action requirements will be included in this letter. If results warrant, VTHSU may place the subrecipient on the Department of Public Safety High-Risk list. All notes and forms should be typed. The visit should be reviewed with the VTHSU Homeland Security Program Manager and Deputy Homeland Security Advisor, advising of critical issues found, corrective actions, and best practices. The VTHSU staff, at which time the report should be finalized, will follow up

corrective action requirements and the file closed. Hardcopy files should be archived with relevant grant history paperwork, while electronic data should be stored within the VTHSU SharePoint Site Programmatic Monitoring folder.

Proper Conduct for VTHSU Authorized Personnel

Monitoring personnel should be professional at all times. They must always display the attributes of objectivity, courtesy, reason, focused engagement, and receptivity. If VTHSU personnel note improper conduct by a subrecipient, they should document the issue and immediately address with supervisory personnel. Interviews can be conducted in an informal manner. VTHSU personnel should be courteous, good listeners, flexible, reasonable and knowledgeable.

List of Attachments:

Attachment A- Pre-Visit Confirmation Letter

Attachment B- Monitoring Interview Matrix

Attachment C- Photo Log

Attachment D- Post-Visit Results/Corrective Action Letter